## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

OFELIA GREY,	)
Plaintiff,	)
v.	) Case No. 1:18-cv-00774
CENTRAL CREDIT SERVICES, LLC,	) )
Defendants.	) )

## **MOTION TO DISMISS**

Defendant Radius Global Solutions, LLC, formerly known as Central Credit Services, LLC and hereinafter "RGS," pursuant to the Fed. R. Civ. P. 12(b)(6), hereby moves this Court for entry of an order dismissing the Complaint with prejudice. As demonstrated in the supporting memorandum filed contemporaneously herewith, Plaintiff Ofelia Grey is judicially estopped from prosecuting the claims in the Complaint.

WHEREFORE, RGS respectfully requests the Court enter an Order dismissing the Complaint with prejudice.

Dated: October 8, 2018 Respectfully submitted,

/s/ Katherine Barber-Jones N.C. State Bar No. 44197 Cranfill Summer & Hartzog 5420 Wade Park Blvd., Suite 300 Raleigh, NC 27607

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Counsel for Defendant, Radius Global Solutions, LLC, f/k/a Central Credit Services, LLC by Special Appearance

## **CERTIFICATE OF SERVICE**

I certify that on October 8, 2018, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Katherine Barber-Jones

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